

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Harvey J. Kesner,

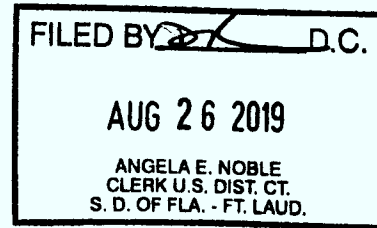
Plaintiff,

Case No. 0:19-CV-61370-RS

Teri Buhl
William "Bill" Alpert
Barron's INC., et al.

Defendants.

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SWORN DECLARATION OF TERI BUHL IN SUPPORT OF DEFENDANTS'S
ALTERNATIVE MOTION TO TRANSFER VENUE AND MEMORANDUM OF LAW

- I am Teri Buhl and I have personal knowledge of the matters set forth below.
- I am a full time resident of New York City, NY. for the past three years. Previously I lived in New Canaan, Conn. and New York City, NY.
- I have not been to the state of Florida in at least ten years.
- I have never knowingly spoken with Harvey Kesner when he was in Florida
- I did not knowingly speak with any residents of Florida for the sourcing of my reporting on Harvey Kesner.
- The one time I spoke with Harvey Kesner on his cell phone, around May 15th 2016, while researching a story on Gregg Jaclin a lawyer who was going to merge with his firm Mr. Kesner said he was in New York State.
- When I email Mr. Kesner or tried to call his office for comment it was to his New York City location. I emailed Kesner to his hkesner@srff.com and hkesner@srfk.com. This is his New York City law firm email address. The only email address Mr. Kesner responded to are his these work email addresses.
- I am a freelance journalist for the last twelve years and a current member of the Society of Professional Journalist.
- I have reported for major news organization that included New York Post, Hearst Connecticut Newspapers, Forbes, Fortune, New York Magazine, New York Observer, The Atlantic and trade publication that included, DealFlow Media, MarketNexus Media, and Doubledown Media. I currently report for Cannabis Law Report.
- I own a news publication called teribuhl.com. I am the sole reporter for the publication. At times I hire freelance editors to review my stories and lawyers to review the content of the stories.
- In March 2019, Judge Franc Perry of New York State Superior court ruled the reporting I did at teribuhl.com was that of a professional journalist.
- Beginning in 2010, I reported exclusive news on Bear Stearns role in the subprime mortgage crisis for The Atlantic and Dealflow Media. The three years of reporting on executives at Bear Stearns who committed violations of the securities and exchange act was prominently featured in the Frontline documentary film, 'The Untouchable', which

aired on January 22, 2013.

- My reporting concentrates on covering wrong doing in the financial industry and I have reported on misconduct that has lead to over half a dozen criminal charges or SEC/ FINRA enforcement actions. My reporting has also led to numerous civil lawsuits brought on behalf of shareholders.
- As a result of my reporting uncovering fraud and other misdeeds on Wall Street the Huffington Post named me one of the "25 Most Dangerous People in Financial Media". This title was for the impact my reporting has on informing the public of wrong doing.
- One of my long time investigations has been into Harvey Kesner's top client Barry C. Honig. I was first to report Honig, and a group of investment professionals that included billionaire Philip Frost, were under investigation for trading as a group of undisclosed affiliates and for running a pump and dump scheme. The reporting on Honig's SEC investigation began 2016. On September 7 2018 the Securities and Exchange Commission charged Honig, Philip Frost and others I reported on for trading as a group of undisclosed affiliates and for Honig being the leader of the pump and dump ring. In July 2019 Honig settled with the SEC for these actions and agreed to a penny stock Bar. Harvey Kesner was Honig's attorney for all three of the companies in the SEC complaint that Honig invested in.
- As is common practice among journalists in the digital media age, some of my reporting is on my website, teribuhl.com (the website). The website is funded through advertisement (I don't take ads from the subject of my stories) and through reader funded donations. I am not paid by the subjects of stories to write about them.
- The 'About' page of the website states 'Anonymous tips can be sent to teribuhl@gmail.com. By this declaration, I am promising anonymity and confidentiality to sources, As a matter of practice I treat all sources as confidential unless they say otherwise.
- Some of the confidential sources I have used in my reporting on Harvey Kesner and his clients have said Kesner threaten them with litigation if they spoke with me.
- At least one of my confidential sources who is directly involved in the companies in the Barry Honig complaint told me the SEC lawyers told my source they are investigating Attorney Harvey Kesner.
- In Feb 2017 a story I reported on Harvey Kesner having ownership direct or indirect in Equity Stock Transfer was hacked and removed from teribuhl.com. I lost valuable reporting and writing with this hack which I believe was done as a result of Harvey Kesner, or his clients that I reported on, hiring hackers.
- I believe this is an anti-slaap lawsuit used to intimidate a freelance journalist.
- I do not have the financial means to travel to Florida and litigate this case. I can only afford to defend myself if the case is in the Sothern District of New York.

I declare under penalty of perjury on this 24nd day of August, 2019, that the foregoing is true to the best of my knowledge.

Teri Buhl

Teri Buhl

august 24 2019

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